

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

V.

No. 4:20 MJ 7194 SPM

TERICA TANEISHA ELLIS,

Defendant.

MOTION FOR PRETRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Angie E. Danis and Gwendolyn E. Carroll, Assistant United States Attorneys for said District, and move this Court to order the defendant detained pending trial, and further requests that a detention hearing be held at the time defendant's initial appearance before the United States Magistrate Judge pursuant to Title 18, United States Code, Section 3141, et. seq., and per current guidance from the Court.

As for its grounds for detention, the government requests this Court to consider the following factors pursuant to Title 18, United States Code, Section 3142.

Presumption of Detention

1. The defendant is charged with conspiracy to commit a murder-for-hire, in which death resulted, in violation of Title 18, United States Code, Section 1958. This is an offense for which the statutorily mandated punishment is either life imprisonment or the death penalty, giving rise to a rebuttable presumption of detention pursuant to Title 18, United States Code, Section 3142(f)(B).

The Nature and Circumstances of the Offense

2. Title 18, United States Code, Section 3142(g) requires this Court to consider the nature and characteristics of the offense charged, including whether the offense is a controlled substance offense or a crime of violence. The defendant is charged with using facilities of interstate commerce to commit a murder in exchange for a monetary reward and, in this case, the murder actually occurred. As a result, the first of the § 3142(g) factors weighs in favor of detention.

The Weight of the Evidence Against the Defendant

3. Section 3142(g)(2) requires this Court to consider the weight of the evidence against the defendant. The government submits that the evidence against the defendant is strong and relies on the facts as articulated in the Complaint Affidavit in reliance on same.

The History and Characteristics of the Defendant

4. The defendant has two misdemeanor convictions from 2006 and 2007 of which the Government is aware at this time. One of those is a misdemeanor drug offense and the other is for indecent exposure. In 2014, the defendant was cited by the Germantown Police Department for failing to appear in court on a traffic violation.

The Nature and Seriousness of the Danger to the Community

5. The defendant conspired with others to arrange for the murder of a 21-year-old man. Despite being at the scene, rather than calling the police, the defendant called her co-conspirator then immediately fled from St. Louis back to her home in Memphis, Tennessee. The safety of the community would be at risk were the defendant to be released on bond. *See* 18 U.S.C. § 3142(g)(4).

Risk of Flight

6. There a serious risk that the defendant will flee because she is facing a significant sentence in this case, based on the severity of the charges and her alleged role in the offense. Furthermore, the defendant does not have any familial, property, or financial connections to the Eastern District of Missouri of which the Government is aware at this time. Furthermore, the Government is not aware of the defendant having a legitimate, long-term history of employment, which also creates concern of a flight risk.

Conclusion

7. The government submits that when considering all of the factors outlined in Title 18, United States Code, § 3142(g), the factors weigh heavily in favor of detention. There is clear and convincing evidence that no condition or combination of conditions that will reasonably assure the safety of any other person and the community as well as the appearance of the defendant.

Respectfully submitted,

JEFFREY B. JENSEN
United States Attorney

/s/ Angie E. Danis
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